

United States District Court
Western District of Texas
San Antonio Division

C.M. on his own behalf and on behalf of his
minor child, D.V.,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. SA-21-CV-00234-JKP-ESC

Stipulation and Motion to Enter Briefing Schedule

As ordered by the Court on November 28, 2021, the parties stipulate to lift the stay in this matter and propose the following briefing schedule.

1. The Court previously extended the stay of this matter until December 27, 2021. *See* Text Order (Nov. 29, 2021). To the extent the case did not resolve, the Court ordered the parties to stipulate to lift the stay and submit a proposed briefing schedule. *Id.*

2. Since the parties' last motion for an extension of the stay in this case, global settlement discussions between have reached an impasse.

3. Consistent with the Court's order, the parties hereby stipulate to lift the stay.

4. The parties have conferred and respectfully request that the Court administratively reopen this matter and enter the following proposed briefing schedule.

a. The United States shall file its motion to dismiss on or before **Thursday, February 20, 2022.**

b. Plaintiffs shall respond to the United States' motion on or before **Monday, March 14, 2022.**

c. The United States shall file its reply on or before **Wednesday, April 13, 2022.**

5. This moderately extended briefing schedule is intended to provide the parties with adequate time to brief the issues raised in Plaintiffs' Complaint and better assist the Court.

Wherefore, the parties respectfully requests that the Court administratively reopen this case and enter the foregoing proposed briefing schedule.

Respectfully submitted,

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